

PHILIP GARRETT PANITZ, CA State Bar No. 096561
BARBARA E. LUBIN, CA State Bar No. 238283
JEFFREY G. SLOANE, NV State Bar No. 784
PANITZ & KOSOFF, LLP
5743 Corsa Avenue, Suite 208
Westlake Village, CA 91362
Telephone: (805) 379-1667
Facsimile: (805) 379-1668
E-mail: pgp@pktaxlaw.com / bel@pktaxlaw.com

Attorneys for Plaintiffs and Counterclaim Defendants
Michael F. Reeder and Pamela O'Keefe,
Trustee for the Jordan Grace Reeder Irrevocable Trust
and Trustee for the Darby Leigh Reeder Irrevocable Trust

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA, NORTHERN DIVISION

MICHAEL F. REEDER.

Plaintiff.

V.

UNITED STATES OF AMERICA,
Defendant.

PAMELA M. O'KEEFE, as
Trustee for the JORDAN
GRACE REEDER
IRREVOCABLE TRUST,

Plaintiff,

V.

UNITED STATES OF
AMERICA,
Defendant.

Civil No.: 3:15-cv-00129-MMD
WGC

**JOINT STIPULATION TO
EXTEND THE BRIEFING
SCHEDULE FOR THE UNITED
STATES' MOTION FOR
SUMMARY JUDGMENT;
[PROPOSED] ORDER**

1
2
3
4
5
6
7
8
9
10
11
12
13
14 **AND RELATED**
15 **COUNTERCLAIMS**

16
17 COMES now Plaintiffs and Counterclaim Defendants Michael F. Reeder
18 (“Reeder”) and Pamela O’Keefe, as Trustee of the Jordan Grace Reeder
19 Irrevocable Trust, dated April 15, 1993 (“JGR Trust”) and the Darby Leigh Reeder
20 Irrevocable Trust (“DLR Trust”), Defendant and Counterclaimant, United States of
21 America (“United States”), Bank of America, N.A. and Heritage Bank of Nevada,
22 by and through their undersigned counsel, and submit a Joint Stipulation to extend
23 the briefing dates with respect to the Motion for Summary Judgment which was
24
25
26
27
28

filed by the United States of America (“United States”) with this Court on May 1, 2018 [ECF 65].

The parties have agreed to the date of June 22, 2018 for Plaintiffs and Counterclaim Defendants to file an opposition to the United States' Motion for Summary Judgment.

The parties have agreed to the date of July 23, 2018 for the United States to file a Reply.

This case has involved a significant amount of discovery thus making the briefing process much more time consuming. Furthermore, Plaintiffs and Counterclaim Defendants have made a global settlement offer to the United States, which is under consideration by the United States. The parties will apprise the Court if settlement is reached.

PANITZ & KOSSOFF, LLP

DATED: May 4, 2018

/s/Barbara E. Lubin

BARBARA E. LUBIN

PANITZ & KOSSOFF, LLP

5743 Corsa Avenue, Suite 208

Westlake Village, California 91362

(805) 379-1667

1 Attorneys for Plaintiffs and
2 Counterclaim Defendants
3

4 RICHARD E. ZUCKERMAN
5 Principal Deputy Assistant Attorney General
6

7 DATED: May 4, 2018

8 /s/Henry C. Darmstadter
9 HENRY C. DARMSTADTER
10 Trial Attorney, Tax Division
11 U.S. Department of Justice
12 P.O. Box 683 Ben Franklin Station
13 Washington, D.C. 20044-0683
14 (202) 307-6481

15 DAYLE ELIESON
16 United States Attorney
17 District of Nevada
18 *Of Counsel*

19
20
21 IT IS SO ORDERED:
22

23 
24

25 UNITED STATES DISTRICT COURT
26 JUDGE

27 DATED: May 7, 2018
28

CERTIFICATE OF SERVICE

I am a citizen of the United States and a resident of the County aforesaid; I am employed in the office of a member of the bar of this Court at whose direction the following service was made. I am over the age of eighteen years and not a party to the within entitled action; my business address is 5743 Corsa Avenue, Suite 208 Westlake Village, California 91362.

On May 4, 2018, I served the within **JOINT STIPULATION TO EXTEND THE BRIEFING SCHEDULE FOR THE UNITED STATES' MOTION FOR SUMMARY JUDGEMENT: [PROPOSED ORDER]** on the interested parties, by scanning and emailed the document as well as placing true copies thereof enclosed in sealed envelopes and sent via Federal Express, Overnight Delivery addressed as follows:

Henry C. Darmstadter, Trial Attorney
Tax Division - US Department of Justice
Ben Franklin Station
PO Box 683
Washington DC 20044-0683

Nathan F. Smith
Malcolm & Cisneros
2112 Business Center Drive
Irvine, CA 92612

Mark G. Simons
Robinson, Belaustegui, Sharp & Low
71 Washington Street
Reno, NV 89503

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct, and was executed at Westlake Village, California on November 27, 2017.

/s/ **Jeanne Melancon**
Jeanne Melancon, Paralegal